

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ERIC CLOPPER, Plaintiff v. HARVARD UNIVERSITY; PRESIDENT AND FELLOWS OF HARVARD COLLEGE (HARVARD CORPORATION); THE HARVARD CRIMSON; AND JOHN DOES 1-10, Defendants	Case No.: 1:20-cv-11363-RGS
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------

ASSENTED-TO MOTION TO SUBMIT AFFIDAVIT OF COUNSEL UNDER SEAL

The Plaintiff, Eric Clopper, respectfully moves, with the assent of Harvard University's counsel, to file under seal the Affidavit of Counsel in connection with the Plaintiff's Rule 60(b) and 6(b) motion. As grounds for this motion, counsel states that the Affidavit of Counsel contains sensitive medical information that is not appropriate for filing on the public docket. Counsel intends to submit the Affidavit by paper filing to the Court.

Local Rule 7.1 Certification

The undersigned counsel certifies that on October 15, 2020, he conferred with counsel for the Defendant, Harvard University, concerning the request to seal. Counsel for Harvard University indicated assent to seal the Affidavit of Counsel, but reserves all rights to oppose Plaintiff's motion.

Respectfully submitted,

/s/ Michael Vigorito
Michael Vigorito, Esq. (BBO#: 696328)
VIGORITO WOOLF PC
100 State Street, Floor 9
Boston, MA 02109
(617) 410-6750
mvigorito@vigoritowoolf.com

Dated: October 16, 2020

Certificate of Service

I, Michael Vigorito, hereby certify that this document has been filed on October 16, 2020, through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and by paper copy to non-registered participants.

/s/ Michael Vigorito